

Exhibit 21

3. What impairment has he described to you, which he claims substantially limits one or more major life activity (i.e., walking, standing, sitting, performing manual tasks, caring her himself, thinking, interacting with others, concentrating, etc.)?

He never described any limitations regarding major life activities, but I remember seeing medical documents that described stress and anxiety and I had some concerns about his ability to handle the stress as a supervisor since he has to be able to think and act clearly and responsibly in life threatening situations.

4. What has been Mr. Kaopua's explanation for what he can and cannot do as far the essential duties of his position? Has he described any aspect of his job that he cannot perform because of his mental condition?

He has never said he cannot perform a duty or responsibility because of his medical condition.

5. When did he first tell you that he was impaired and had a mental disability?

He never told me that he had a mental disability. I have never seen any documentation that says he is disabled and unable to do his job.

6. When did he first tell you that he needed to be accommodated for his medical condition? How did he make this request?

I don't remember when I was first told this, but I believe it was after Hazel received a letter from his attorney telling us what accommodations were needed to bring Mr. Kaopua back to work. While he was out on sick leave I remember telling Hazel Wong that I needed to get him back to work. At one point, I remember he was transferred to Station 14 and he later said he was being punished by being at Station 14, and he wanted to go back to Station 11. After Mr. Kaopua's attorney finally described the accommodations that were needed, I remember telling Hazel that Mr. Kaopua could go back to Station 11, and I would make sure they were not assigned to the same station so they would be some assurance that they would not come in contact with each other. In my opinion, we accommodated Mr. Kaopua after he told us what kind of accommodations were needed.

7. What was the accommodation that he claims he needed?

As stated above, he wanted to go back to Station 11 and he did not want to have any contact with Captain Abad, and these were things I could agree to. He also said he did not want to work for Chief DeLaura and that was something I would not agree to.

8. To your knowledge, can Mr. Kaopua work at any fire station that does not put him in contact with Mr. Abad or are there certain aspects of his position as a Captain that he cannot perform?

Yes, he can work at most stations that would not put him in contact with Mr. Abad, but there are several stations that, even as a Captain, he does not qualify to work at. For example, at the Pearl Harbor Naval Shipyard he needs to be HAZMAT certified, which he isn't. There are some limitations as to where we can send him and Captain Abad because of their qualifications.

9. What happened after you became aware of his request for accommodation?

I worked with Hazel Wong and we were able to accommodate most of Captain Kaopua's requests so he was able to report back to work.

10. Did you request medical documentation and did he provide it (when was it provided)? Did you sit down with him and/or his attorney to talk about his mental disability and limitations? If yes, what was discussed? If no, why not?

I did not personally request any medical condition – this was handled by the personnel office. I never talked to Captain Kaopua or his attorney about his medical condition and he never called me or asked for an appointment to meet with me to discuss this matter.

11. Why didn't you accommodate him sooner?

I did it as soon as I was told what he was requesting in terms of accommodation and I concluded that we could grant most of the accommodations that he requested.

12. He claims he was moved from Lualualei, after he lodged his complaint against Mr. Abad. Explain what happened and why he was moved, instead of Mr. Abad.

We felt that a lot of the problems between them were happening for a while and they were both responsible. For example, we had a problem with James Carter, who worked for Captain Kaopua. Mr. Carter was coming to work without a valid driver's license and Kaopua is supposed to check this type of thing periodically and didn't. We also found out that Carter was basically living at the fire station and Captain Abad was letting him sleep at the station on his days off because he was homeless. This went on for about two years. We felt that both supervisors were not doing their jobs properly because Mr. Kaopua knew this was going on (although he was not the one giving Carter permission) and he did not report the problem. My concern was that we had a outlying station and problems were reported and we would be better served if we moved both of them out of there – and that's what we did.

13. Mr. Kaopua claims he talked to you about Abad's death threat on October 25, 2001 and nothing was ever said to help him feel secure at work, to assure him that he would be protected, or to help him feel safe. What is your response to this?

I remember going to Station 11 with Chief Kaea and I remember telling him, "let's go over there and check this stuff out." We drove over there and Kaopua took us around the station and showed us the area where Abad was feeding the wild pigs. But while we were there, we did not see any wild pigs, but we could see the pig droppings. There was also a caged area about a 100 yards away from the station and I could see a caged domestic pig. We talked to Kaopua and he was complaining about Captain Abad, i.e., the ice machine, the pigs, the escargots and fish that Abad was raising. I remember asking him if he raised these concerns to a higher level and he said he did. It was around this time that we were reorganizing from three areas to two areas and there were changes in his supervisor. I told him that I would go back to talk to his supervisors and I would have them get back to him. Right after this I met with both supervisors and felt that the wild pigs were being fed, but I didn't see the pigs. I did tell the AC's to have the men stop feeding the pigs and to my knowledge this matter was corrected. As far as the fishes and escargots, I don't think this was a problem. Mr. Kaopua